

Standardization Section
Fresh Products Branch
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Washington, DC

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Comments Concerning United States Standards for Grades of Bunched Italian Sprouting Broccoli, Sections 51.3555 through 51.3573, Federal Register Vol. 70, No.76, Thursday, April 21, 2005, Page 20730

I applaud the decision to update/revise a US Grade Standard that has long outlived its usefulness in accordance to present day cultural and marketing practices. I offer my opinion on some aspects in the standard that needs updating and/or additions to it.

The US Fancy grade should be eliminated. US No 1 grade is by far the most utilized grade and in many instances, further enhanced, by specifying upgrades, or contract specifications.

Would rather utilize "Bunched" as a separate grade, such as "US No 1 Bunched" and continue with "US No 1 Crowns" and "US No 1 Florets". There should be a "US No 2" grade for each of the afore mentioned styles.

SAMPLE SIZE AND DETERMINATION OF PERCENTAGES

BUNCHED in cartons always by count and entire container, unless packed in bulk bins or similar container, 25 count sample is appropriate.

CROWNS and **FLORETS** are normally packed in 20 lb cartons.

Sample Size in Crowns at least 10 lbs, preferably the entire container and Florets, a 5 lb sample. **PERCENTAGES ALWAYS BY WEIGHT.**

PART TWO to the Inspection Instructions recommends count when uniform in size. The 3 inch variation for deciding uniformity is unrealistic and may cause bias. For example, a 3 inch crown with the same value as a 6 inch crown could very well to cause a lot to fail grade when by right 2 or 3 smaller crowns will weigh the same as a 6 inch crown.

SIZE AND STEM LENGTH FOR CROWNS AND FLORETS

CROWNS 3 inch minimum diameter with a 10% tolerance for undersized crowns. No maximum size. Stem Length- 2 inch maximum with a 5% tolerance for stems exceeding 2 inches.

FLORETS 3 inch maximum diameter with a 10% tolerance for oversized florets. Stem length- 1 inch maximum with a 5% tolerance for stems exceeding 1 inch.

In either instance, diameter and stem length may be
"unless otherwise specified".

Requirements for Size and Length in Bunched need to be revisited and likely revised and updated.

"Shoot" is no longer a factor, in most cases it ends up trimmed and qualifies as either as a crown or floret.

Size in Bunched, diameter and/or length to be reported with a range including a mostly statement.

"Flowering buds" and "Verge of opening" have caused much controversy. More than 3 open flowering buds on a head 3 to 6 inches in diameter is simply too restrictive. Would treat both these factors if they affect the appearance, and discoloration of any kind, when more than 1/8 of the surface is affected. Broccoli that shows buds swollen and barely open and a small degree of yellow is apparent should be ignored, unless they project a yellowish cast. then discoloration guidelines be implemented.

The basis for 1/8 of the surface affected pertains to discoloration, immature buds, blighted buds, is easily achieved by halving four times a head or crown, or quartering the same twice.

OTHER FACTORS

"Mechanical Damage" should address improperly clipped/trimmed stems/stalks, noticeable portion of head, crown or floret missing.

Perhaps a properly clipped/trimmed stalk or stem should be defined as a fairly straight perpendicular cut.

"Water soaked" areas should be expanded to include leaves when in contact with pack and tend to be watersoaked and translucent, bunch should be considered as damaged when showing an appreciable amount and detracts from the appearance.

"Freezing and Freezing Injury", the words 'ice crystals present' should be deleted to remain consistent with other instructions.

A point of Interest, would it be informative to find out how much of each "style" of Broccoli is currently marketed. Might be of some help in deciding which area to stress the most.

NOTE As a matter of thinking outside the box, so to speak, would it be possible to compile a list of the most popular dishes/recipes for Broccoli in conjunction with the final rule. Perhaps industry association, or USDA Nutritional Service could contribute both in recipes and publication costs.

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